Docusign Envelope ID: E9A5462B-C203-4DD3-AB5C-E6C3B0B0FFCB



UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TEXAS BEAUMONT DIVISION

Peter Harris and Loni Harris,

Plaintiffs,

Case No. 1:24-cv-00313

v.

Upwintrade.com, a business association; David Shamlian, an individual; John Does 1-20,

Declaration of Delaina Snyder

Defendants.

I, Delaina Snyder, state and swear as follows.

I. Introduction

- 1. My name is Delaina Snyder. I am of sound mind and capable of making this Affidavit. I have personal knowledge of the facts stated herein.
- 2. I learned of this case through search-engine results online and subsequently contacted the lawyer for Peter and Loni Harris. I am submitting this Declaration to provide evidence of my own experience with the same scammers who victimized the Harrises.

II. Chronology & Evidence

3. My first contact with the Upwintrade scam was through Facebook. An account that appeared to be operated by Kerrie Zimmerman,

someone I know personally, made a Facebook post about a new boutique clothing store she was opening. This post implied that Kerrie had earned the money to open the boutique by "trading cryptocurrency with Tony Hattennsty."

- 4. I sent a direct message to this account inquiring about this cryptocurrency-trading success. This person directed me to message Tony Hattennsty on Skype and provided me his Skype information. I later confirmed with the real Kerrie Zimmerman that her Facebook account had been hacked and taken over by unknown persons prior to the date of the post and messages described above. True and correct copies of the initial Facebook post and direct messages described above are attached to this Declaration as Attachment A.
- 5. My husband and I soon messaged Tony Hattennsty on Skype. Hattennsty advised us to make an account on www.upwintrade.com. He walked us through the process of funding our own account Crypto.com account using U.S. Dollars, then using those dollars to purchase cryptocurrency, and then transferring that cryptocurrency to a deposit address provided by Upwintrade. A true and correct copy of our Skype conversation with Hattennsty is attached hereto as Attachment B.
- 6. In the period from April 26 to June 16, 2024, my husband and I transferred Bitcoin with a U.S.-dollar denominated value of \$147,289.01 to

Upwintrade. A true and correct copy of our transaction-history export from Crypto.com is attached to this Declaration as <u>Attachment C</u>.

- 7. Over time, our "trading account" at upwintrade.com showed that we had made a significant profit on our "investment," with our balance reaching \$2,814,379.00 by August 2024. True and correct copies of screenshots of the Upwintrade platform showing this purported account balance, our transaction history, and the Upwintrade deposit address are attached as Attachment D.
- 8. While my husband and I continued to believe that we were making significant profits through Upwintrade, we directed a friend of ours named Scott Dannatt to Hattennsty, who directed Scott to Upwintrade. Scott transferred cryptocurrency with a dollar-denominated value of approximately \$50,000.00 to Upwintrade's deposit addresses in a series of transactions in July and August 2024.
- 9. My husband and I eventually told Hattennsty that we would be withdrawing from the Upwintrade platform on August 10, 2024. At that time, Hattennsty told us that we would be required to pay a 10% commission directly to him before the withdrawal could be processed. Contrary to what he had previously promised, he said that this commission could *not* be paid with the assets already in our Upwintrade account. Instead, we would have to transfer additional assets beyond that which we had already sent to

Upwintrade. This commission would have amounted more than \$250,000.00 worth of cryptocurrency. We could not afford to make this payment.

- 10. Through additional online research, we learned about this case and pig-butchering scams. We understood immediately that we had been the victims of a pig-butchering scam. We have voluntarily provided the attached evidence to the Harrises' counsel and the FBI. We understand that an FBI investigation is ongoing and that several cryptocurrency-exchange accounts have been frozen.
- 11. My husband, Mr. Dannatt, and I understand that we are not plaintiffs in this case, and that we are not represented by the Harrises' counsel. I am providing this Declaration because we want to support any effort to freeze stolen assets held by the Upwintrade scammers, in hopes that a large enough pool of assets might be frozen to allow for recovery by all of Upwintrade's victims.

[SIGNATURE PAGE FOLLOWS]

Docusign Envelope ID: E9A5462B-C203-4DD3-AB5C-E6C3B0B0FFCB

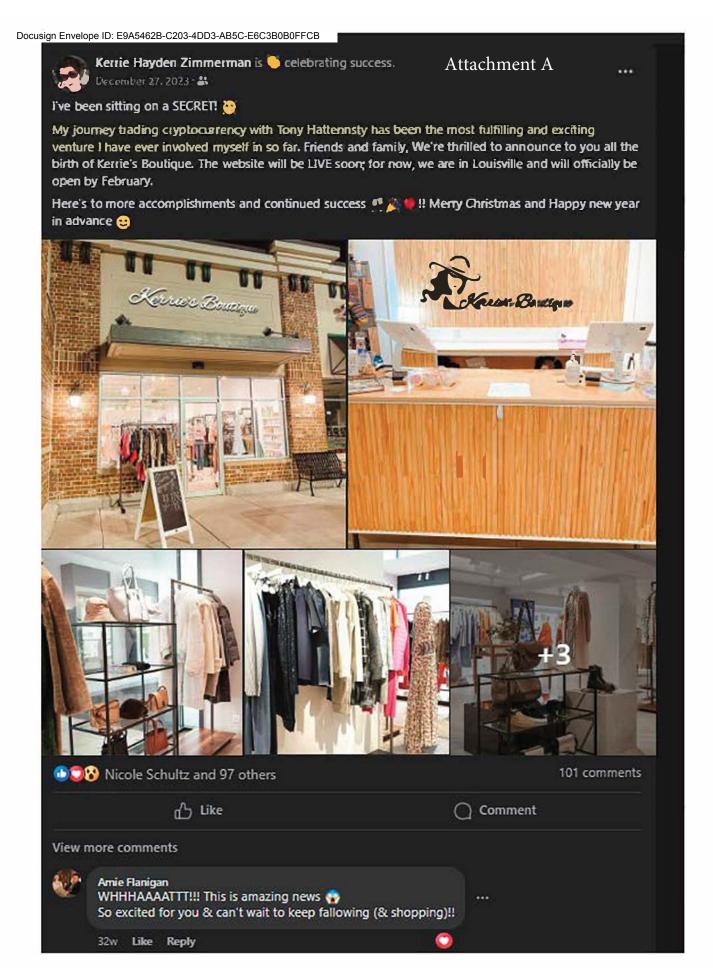
VERIFICATION

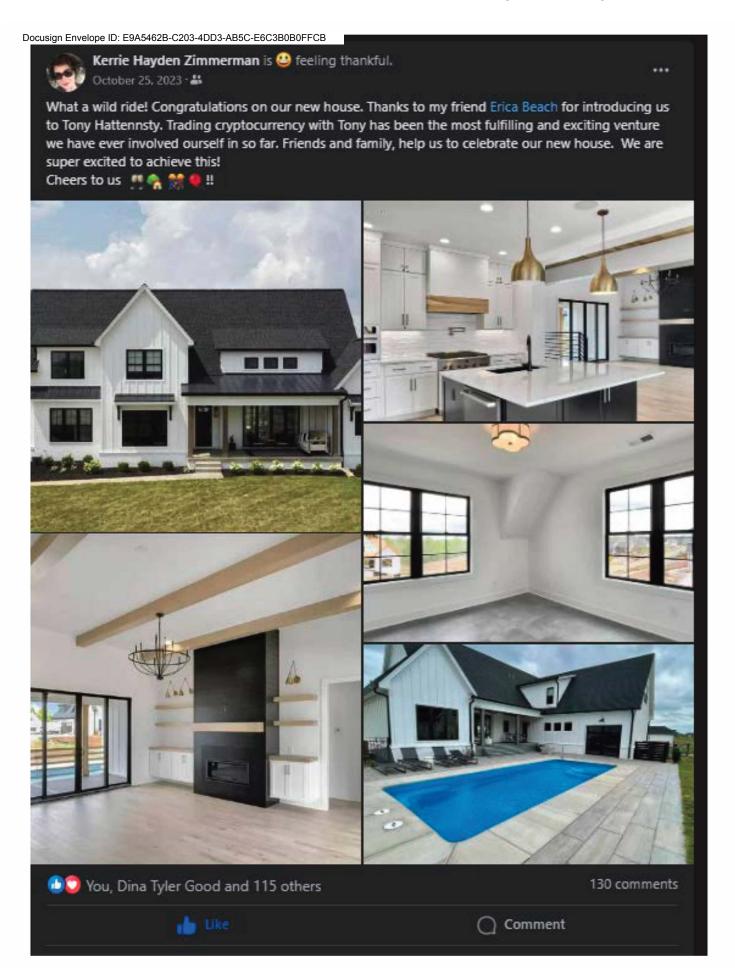
I, Delaina Snyder, hereby verify and declare under penalty of perjury that the foregoing is true and correct.

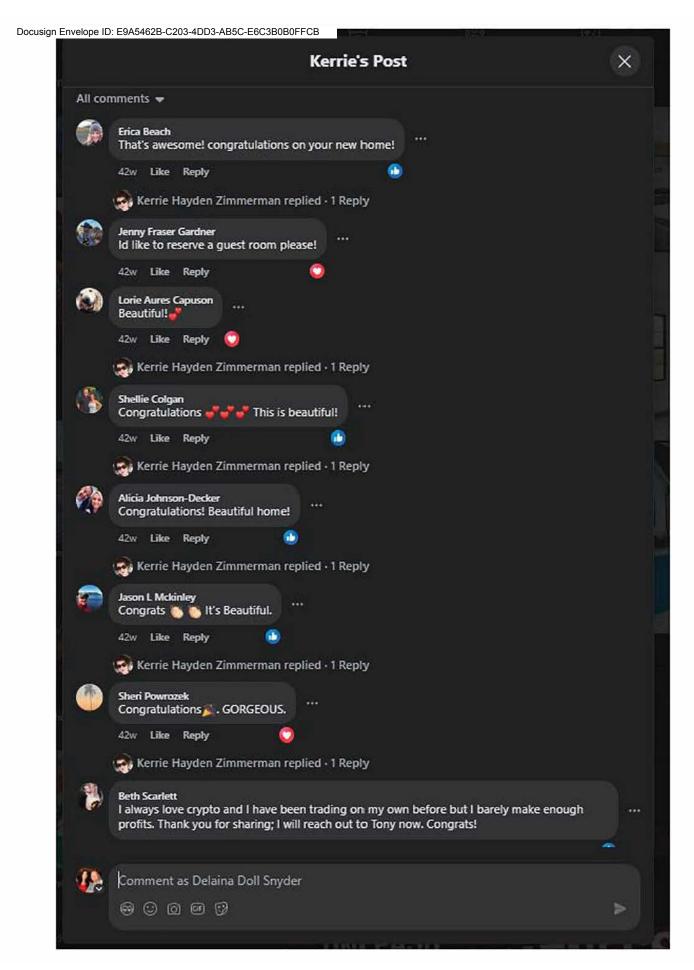
9EBE65A5661D402

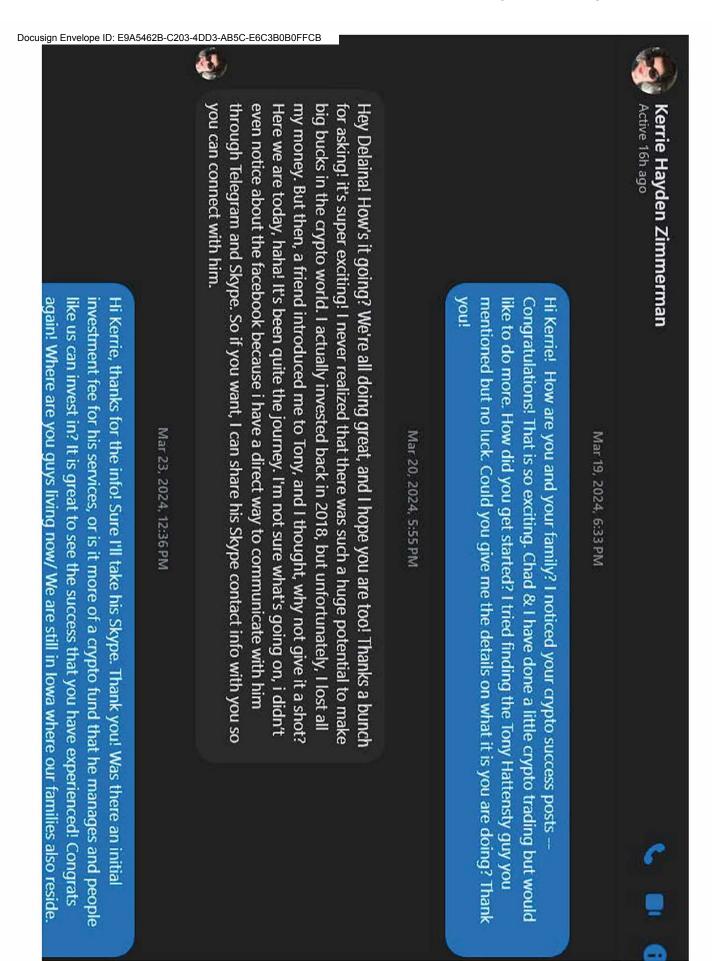
Delaina Snyder

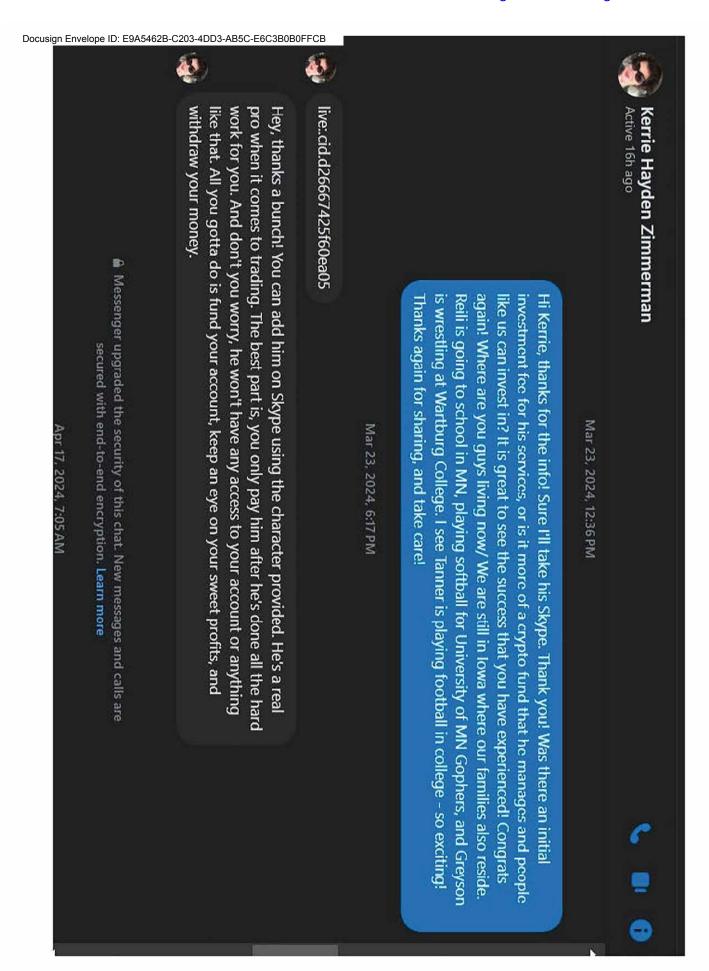
Dated: 8/30/2024

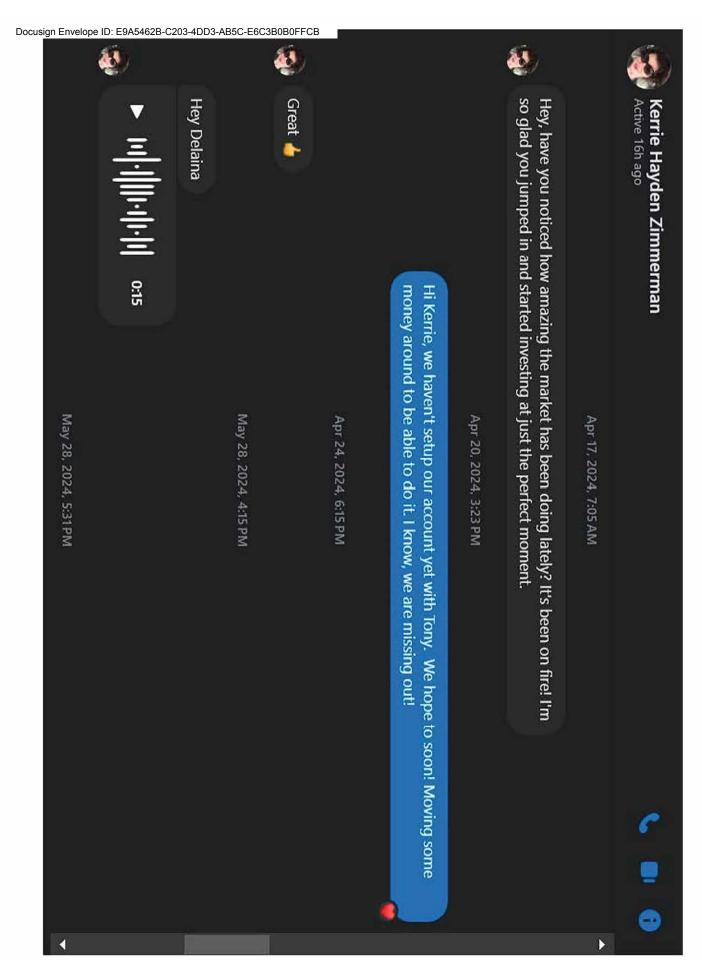


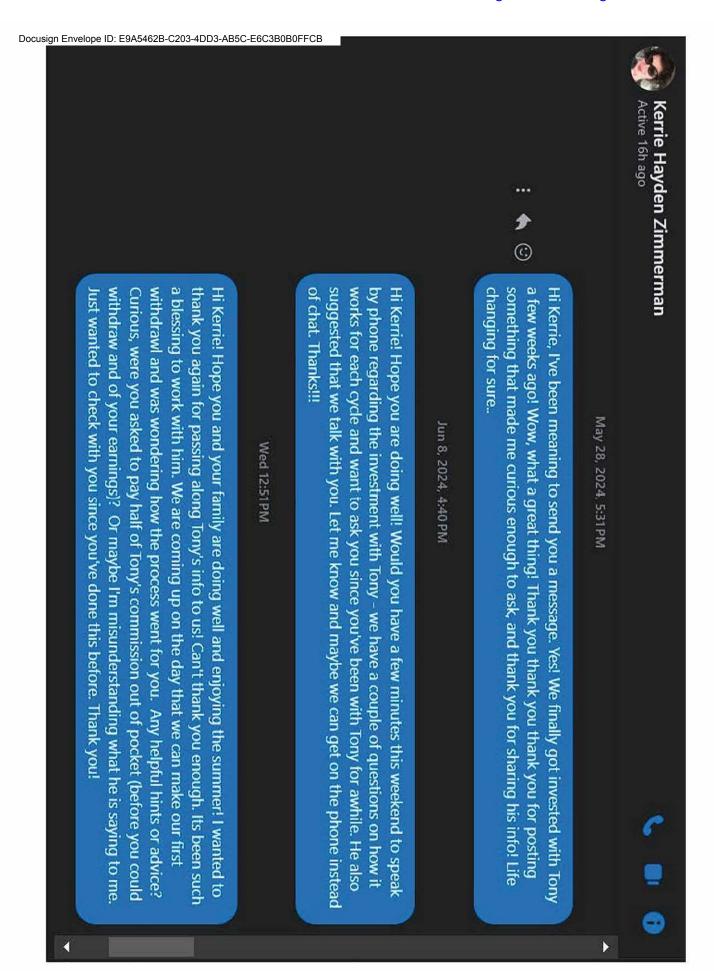


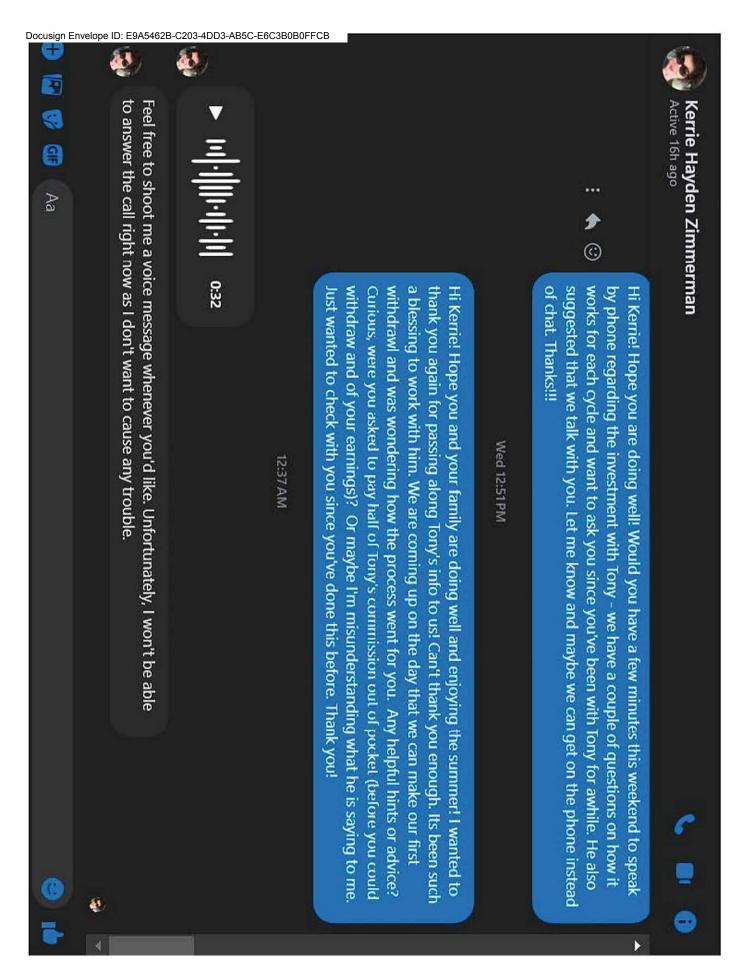




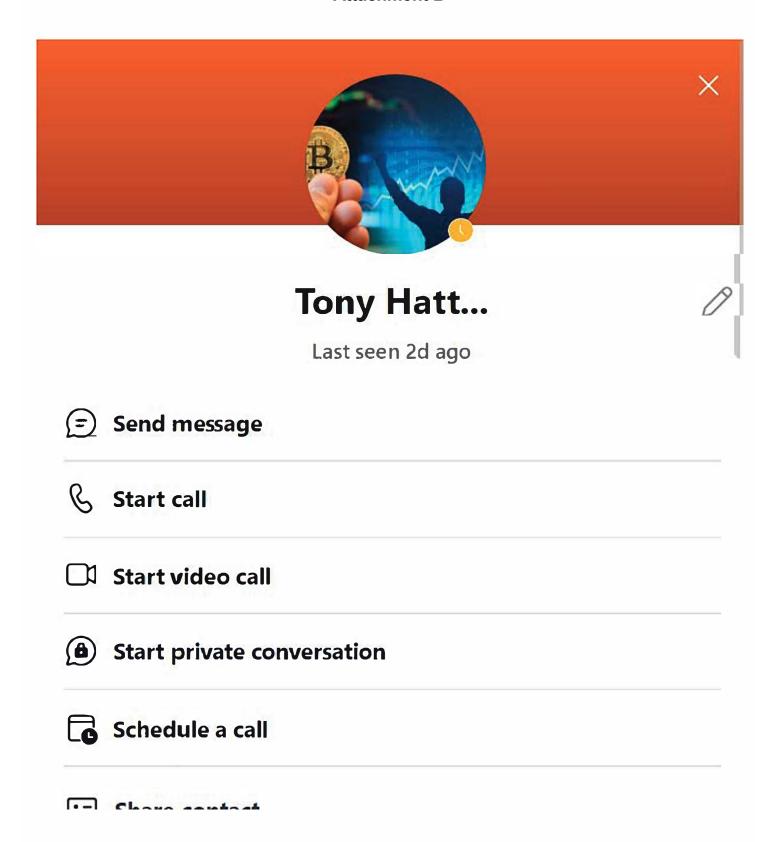








Attachment B



Al Bot

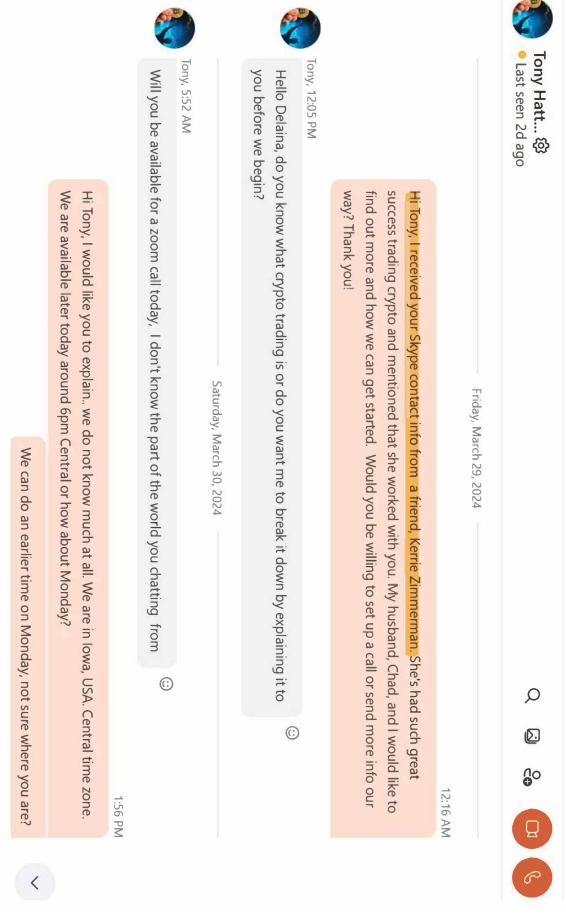
PROFILE

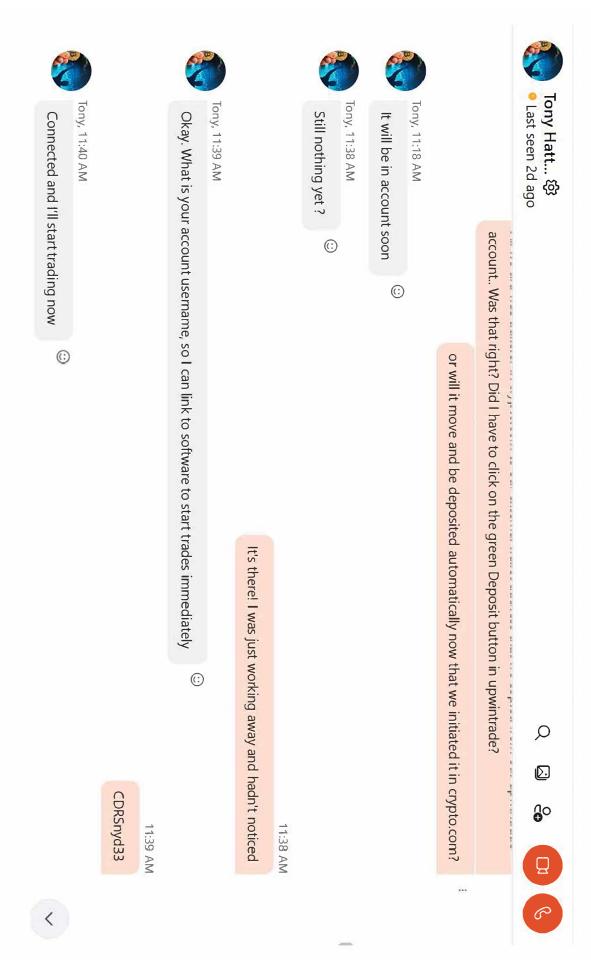
Copilot in Chat

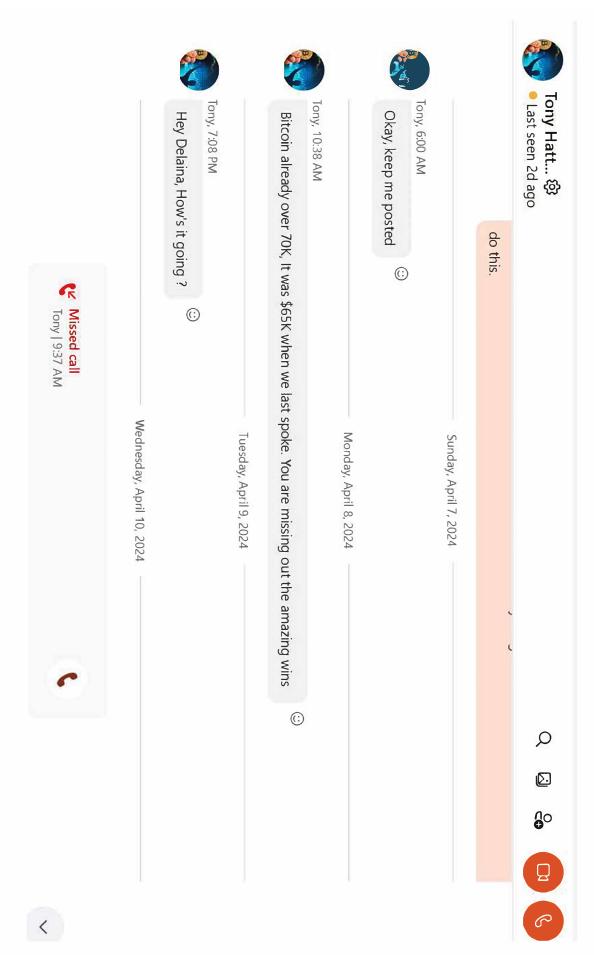
Skype Name

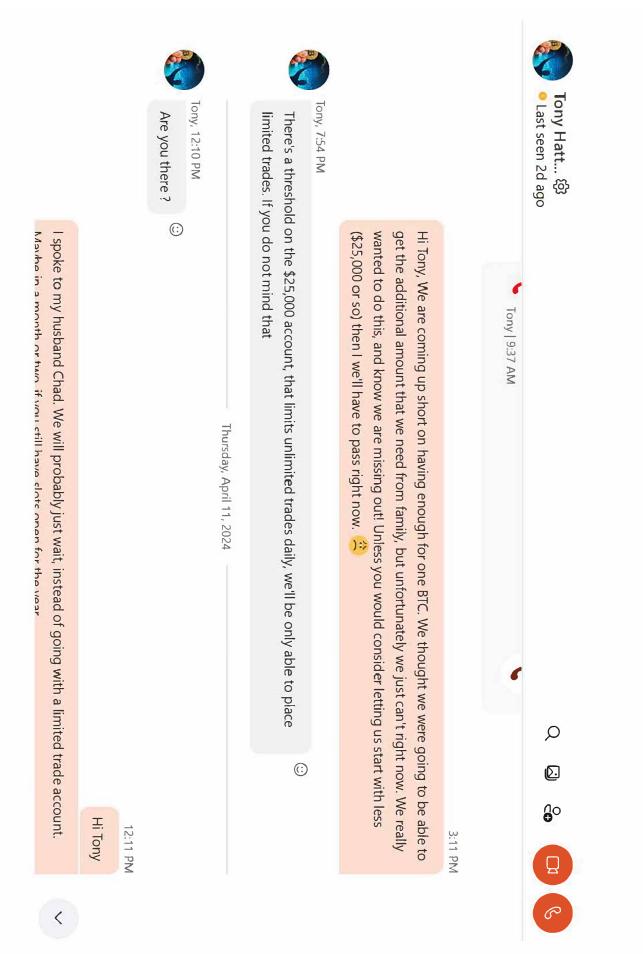
Add to favorites

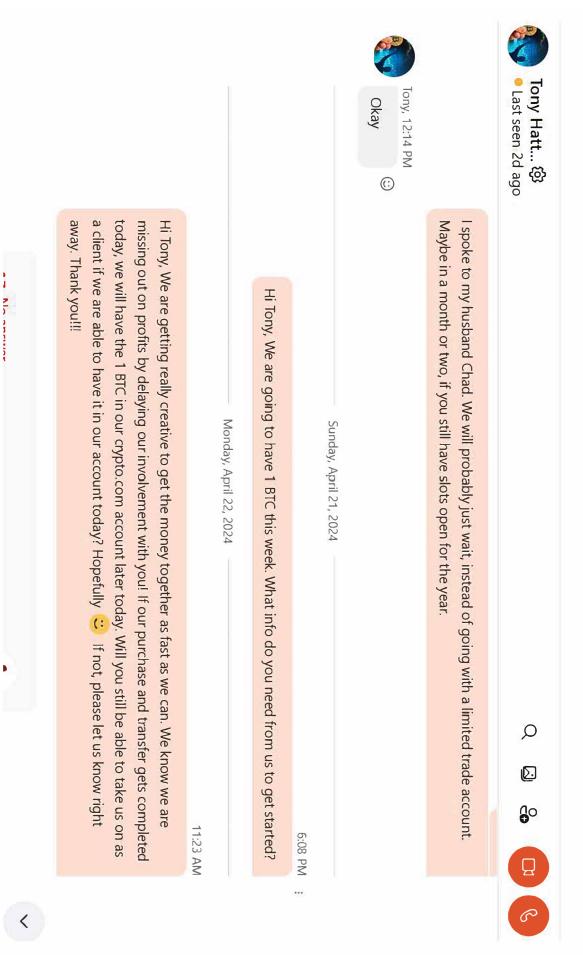
Profile X live:.cid.d26667425f60ea05

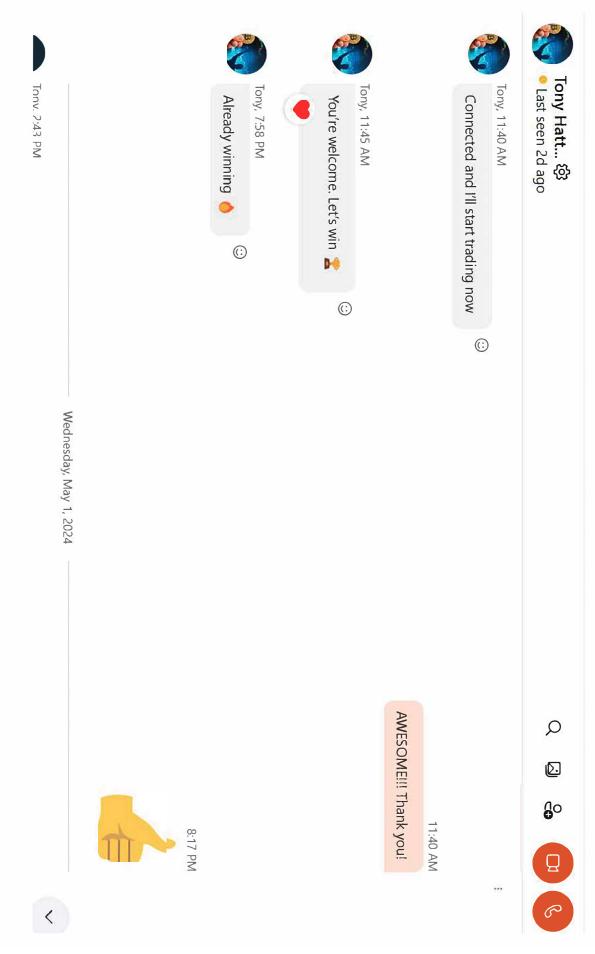


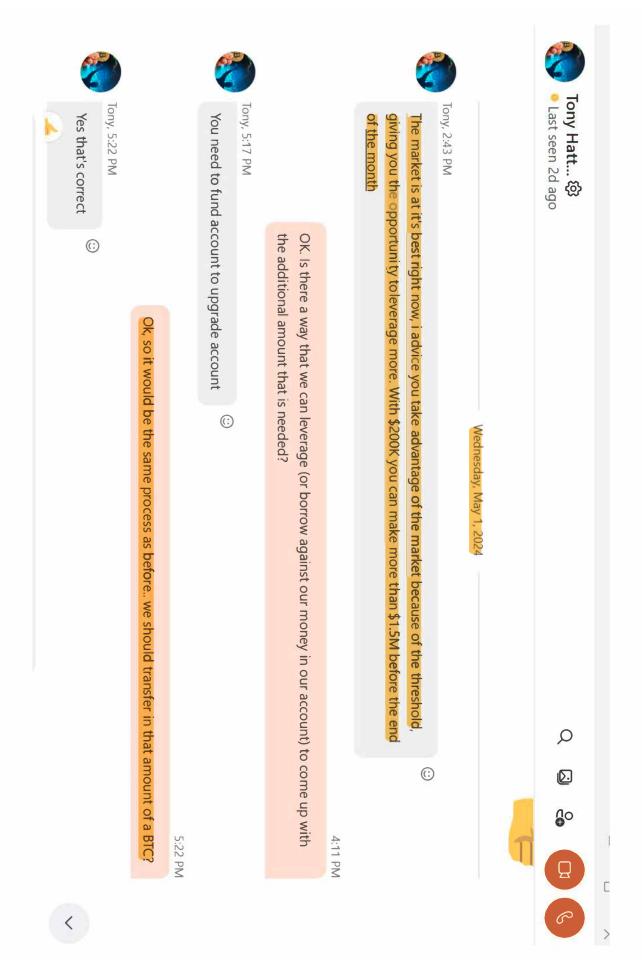


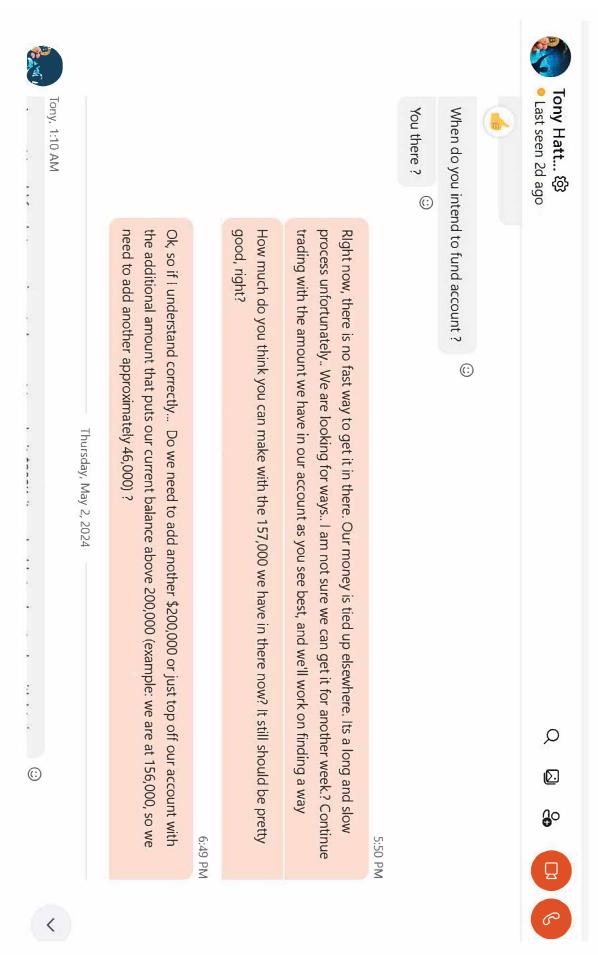


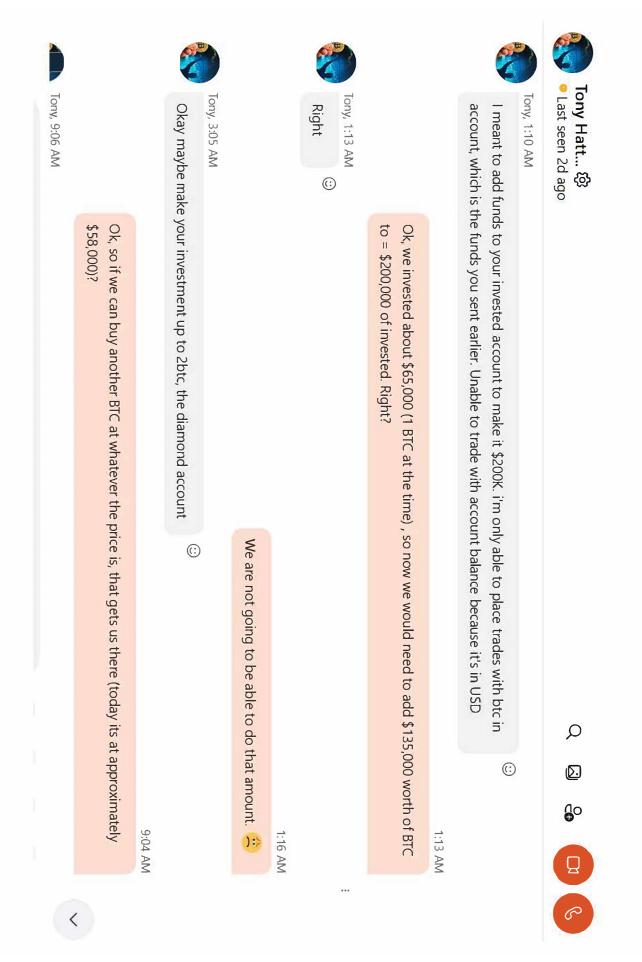


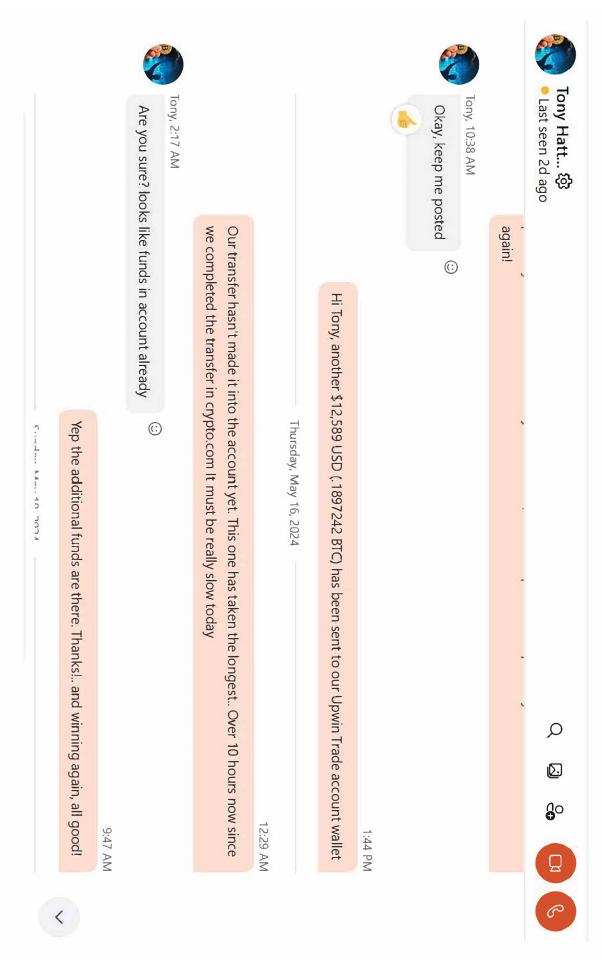


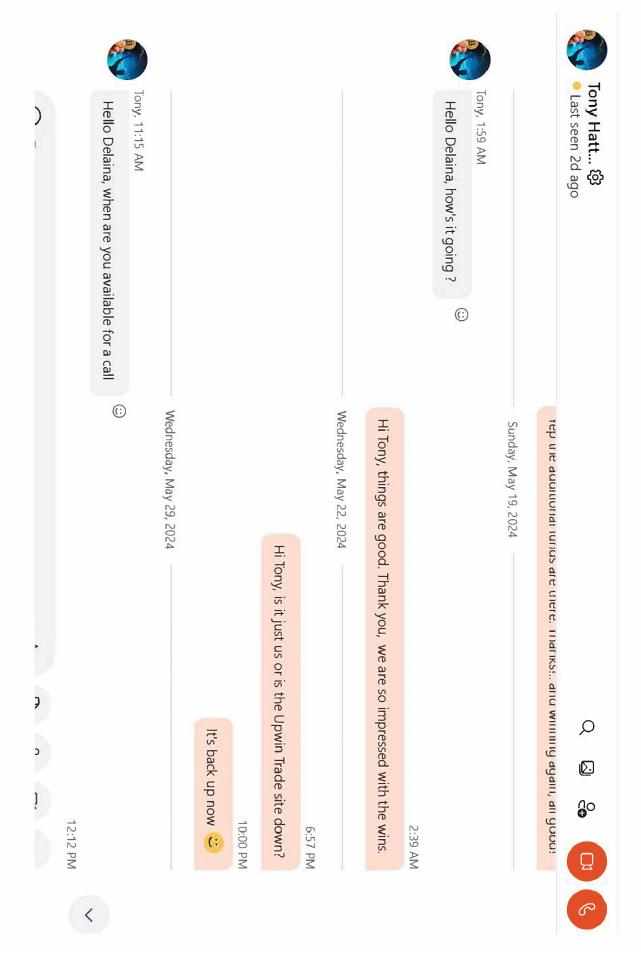


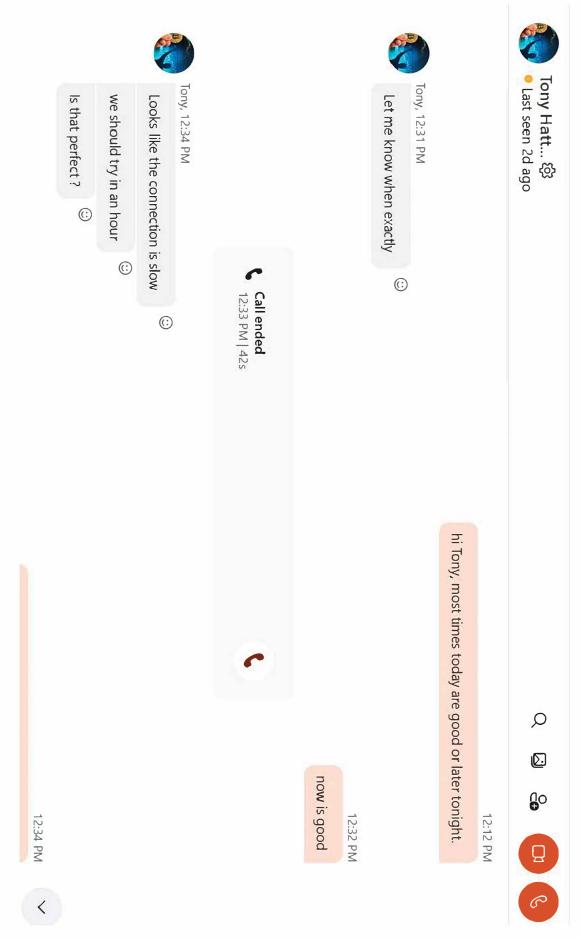


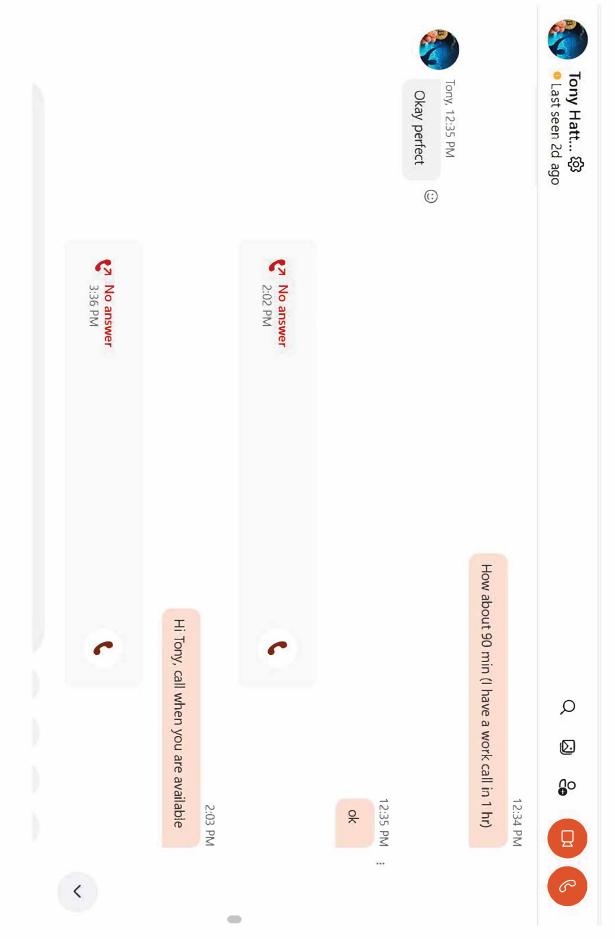


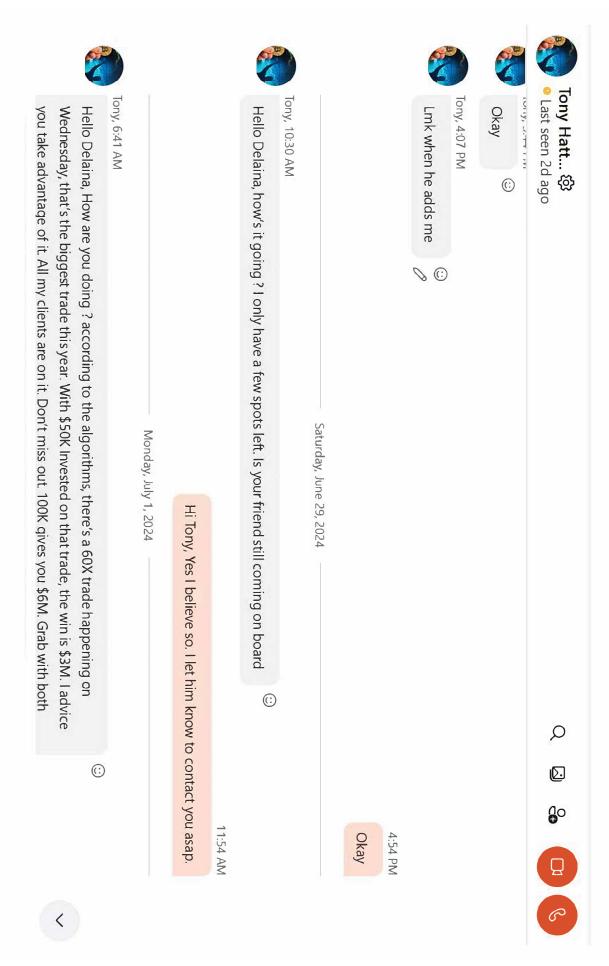


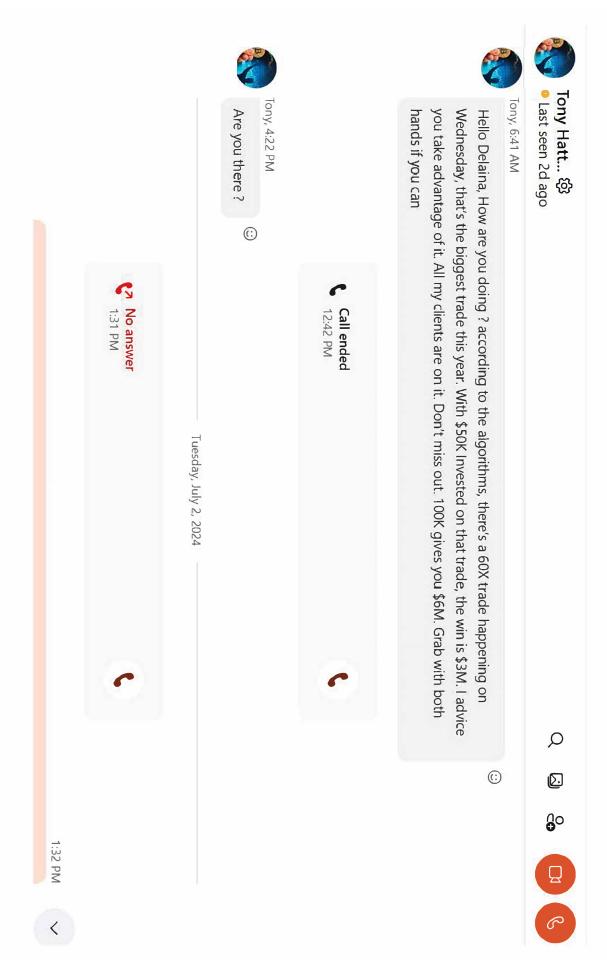


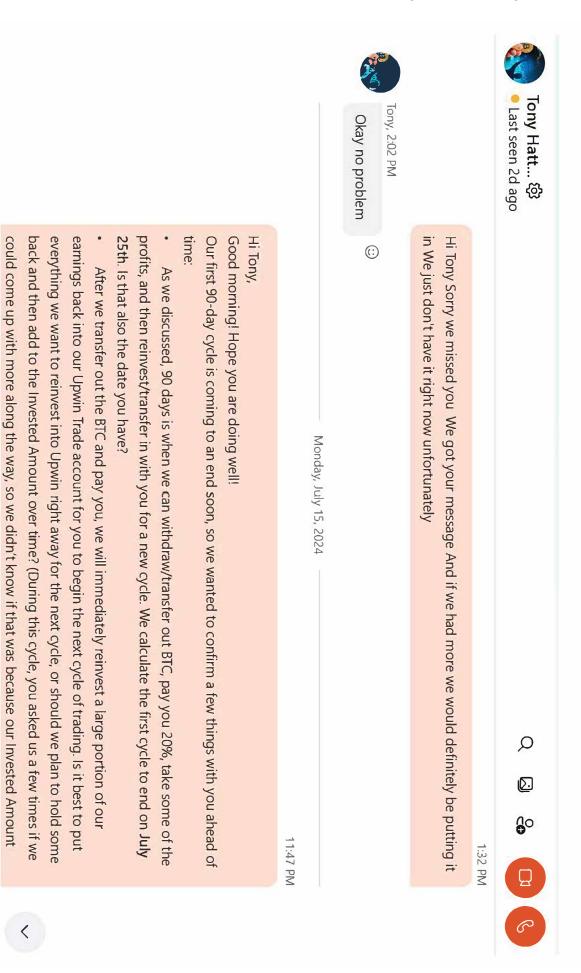














put in right away but can hold some back if there's a reason to add over time vs. a large amount all up investing one big amount right away. Like I mentioned, for this next cycle, we will have a lot more BTC to wasn't enough to work with, or if it's better to add more over time due to the market changes vs. could come up with more along the way, so we didn't know if that was because our Invested Amount

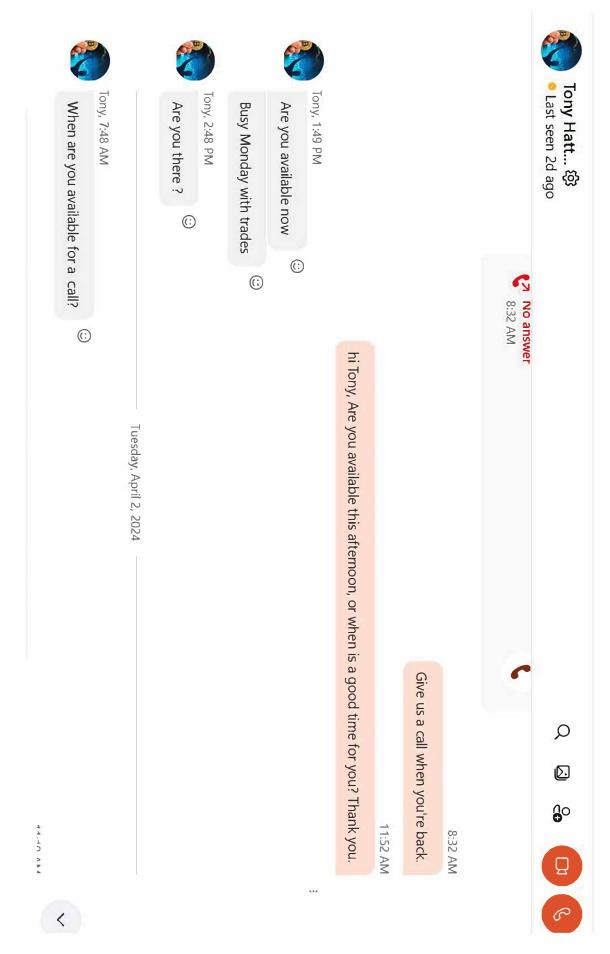
- account to your wallet address, or do we transfer directly from our Upwin Trading account to your wallet? We may have discussed this before, but how do we pay you? Do we transfer from our Crypto.com
- the transfer out?) How/When do you calculate your 20% (is the amount based on the # of BTC on the day we initiate
- hardware wallet, or do you recommend another way?) better/more secure way to do it? (Is crypto.com a secure place, or should we use something like a cold Security -- Is the best to transfer out to our own wallet address on Crypto.com, or is there a
- possible!) who understands how crypto is taxed in the USA? (we want to be sure we are paying as little tax as Taxes -- Do you know anyone (or do you know who your clients work with) that we can speak to
- account to our kids' own accounts) Do we get taxed on BTC transfers to other accounts (example, if we transfer BTC from Chad's

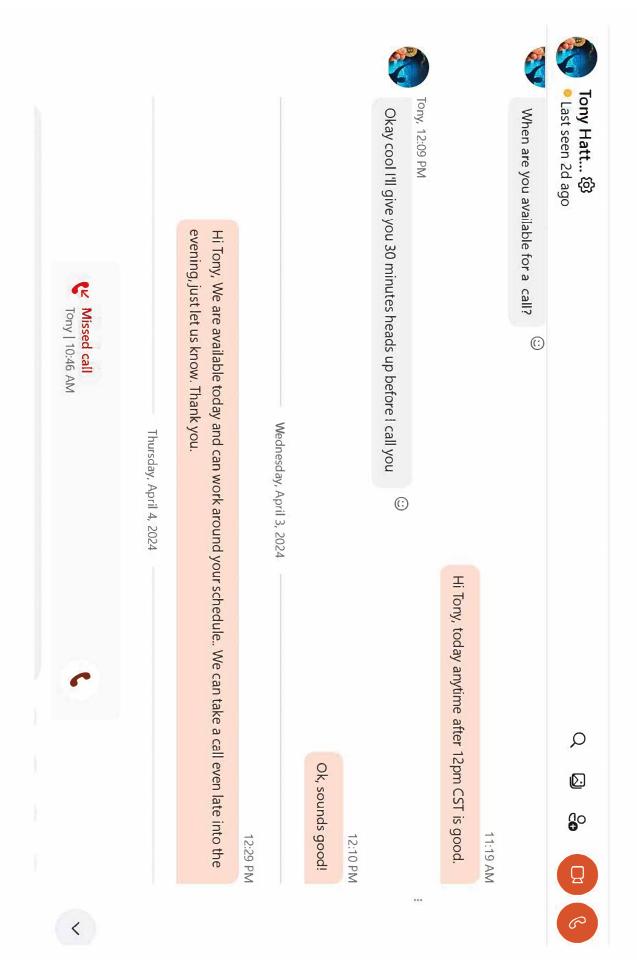
work with you long term working with you and are very pleased with the gains in our account! We look forward to continuing to Thank you! We also wanted to say that we are thankful we found you through my friend Kerrie. We enjoy

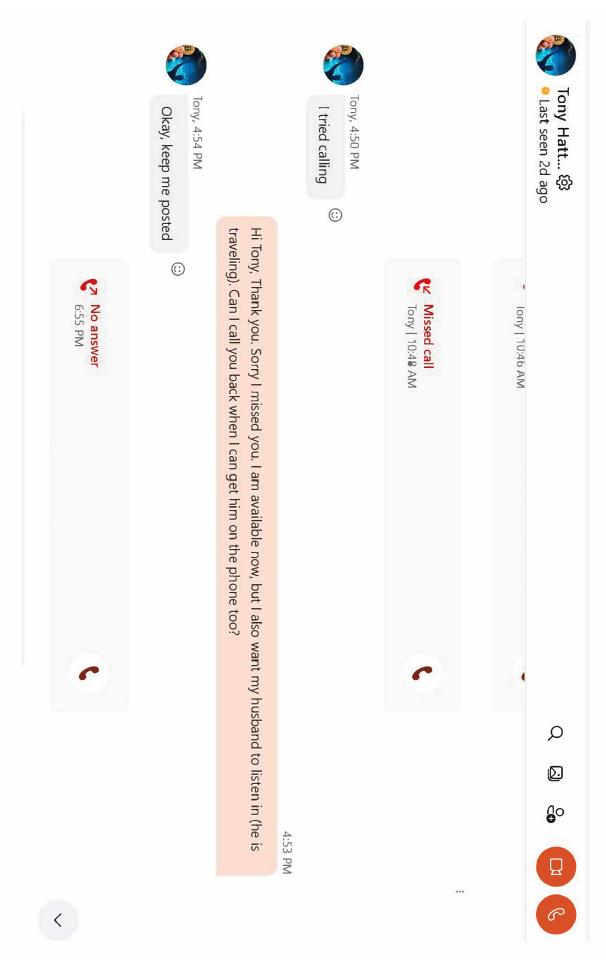
Wednesday, July 17, 2024

Q

0

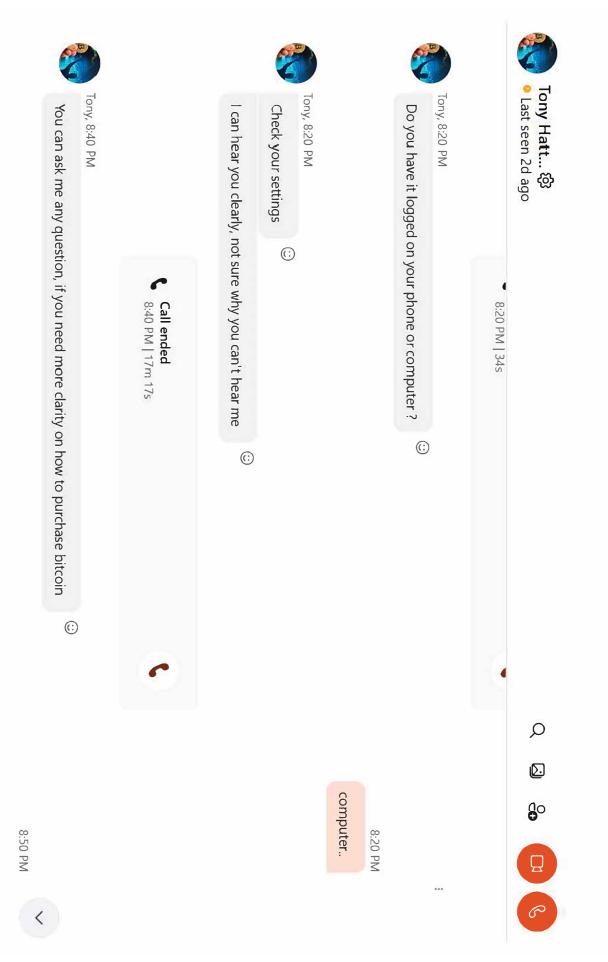


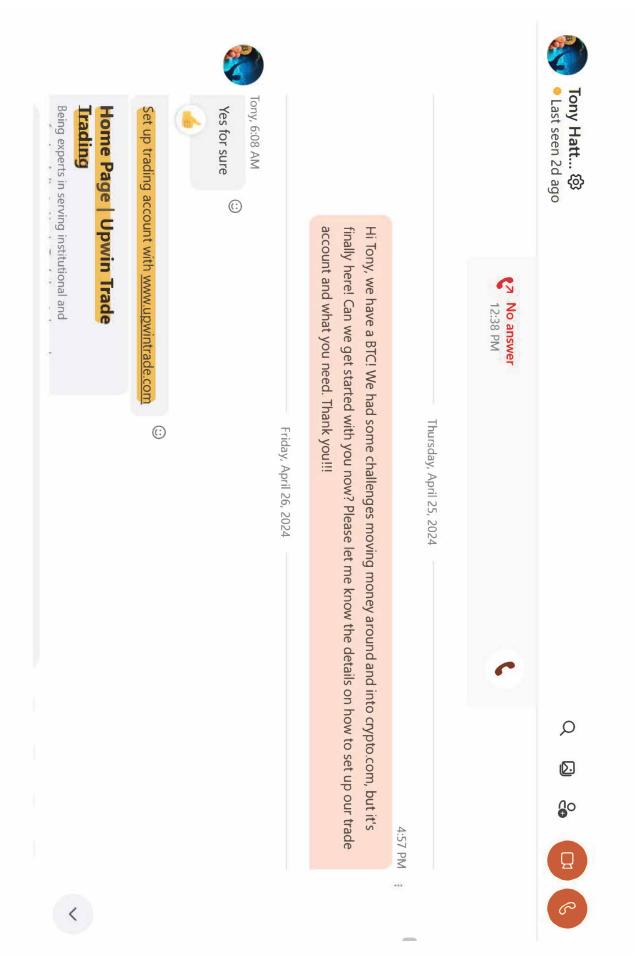


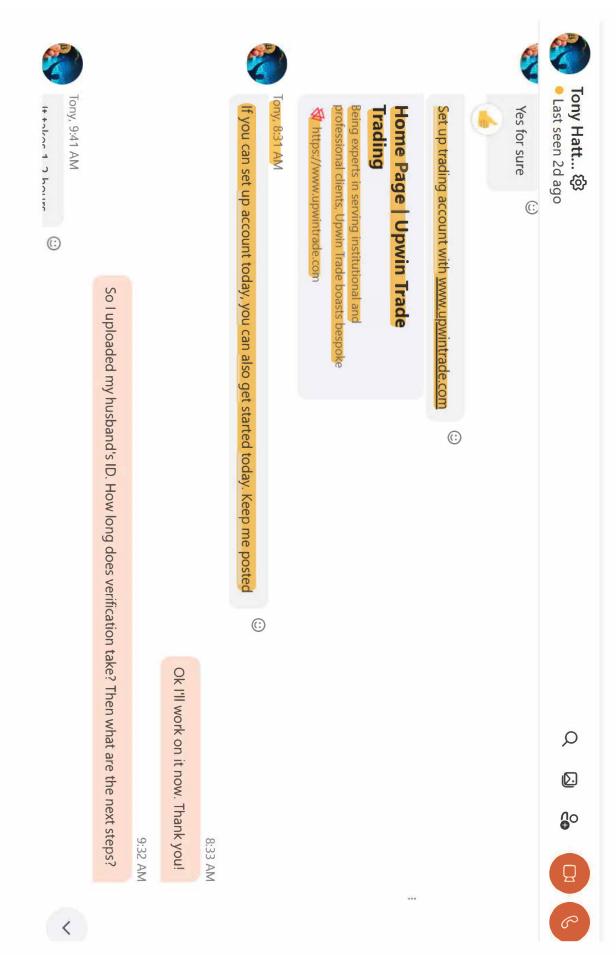


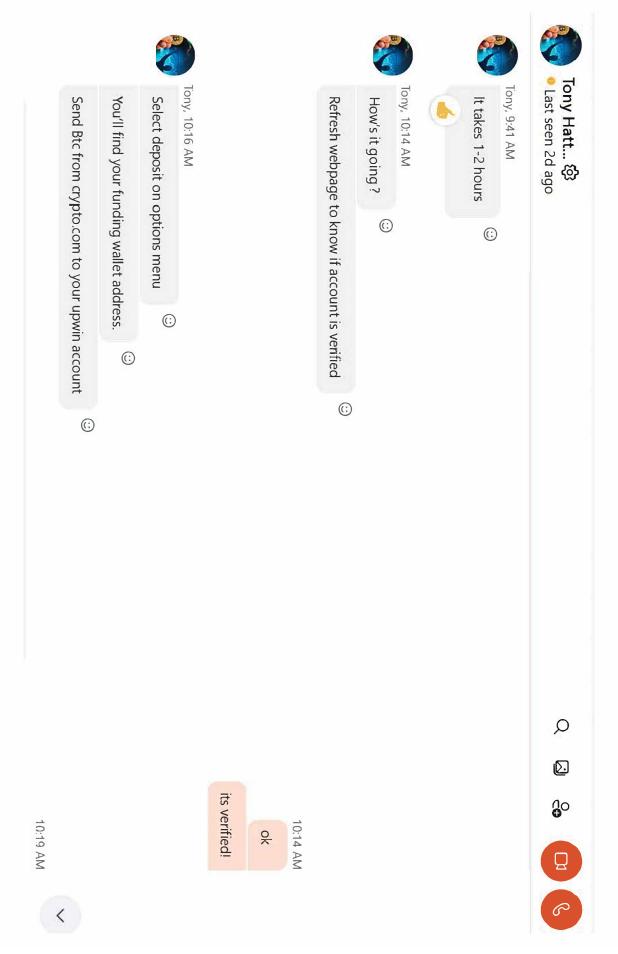
HAR0279

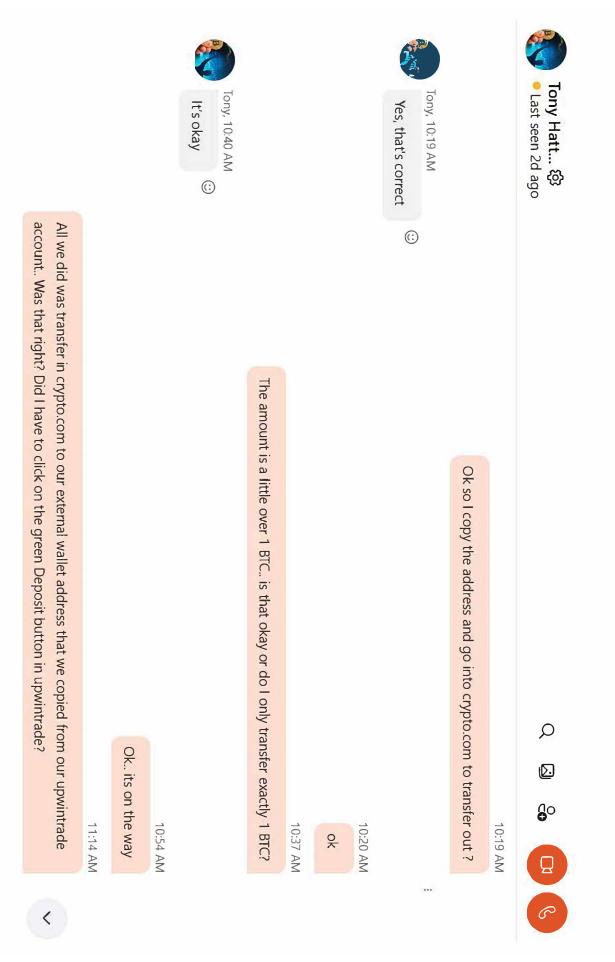
Docusign Envelope ID: E9A5462B-C203-4DD3-AB5C-E6C3B0B0FFCB

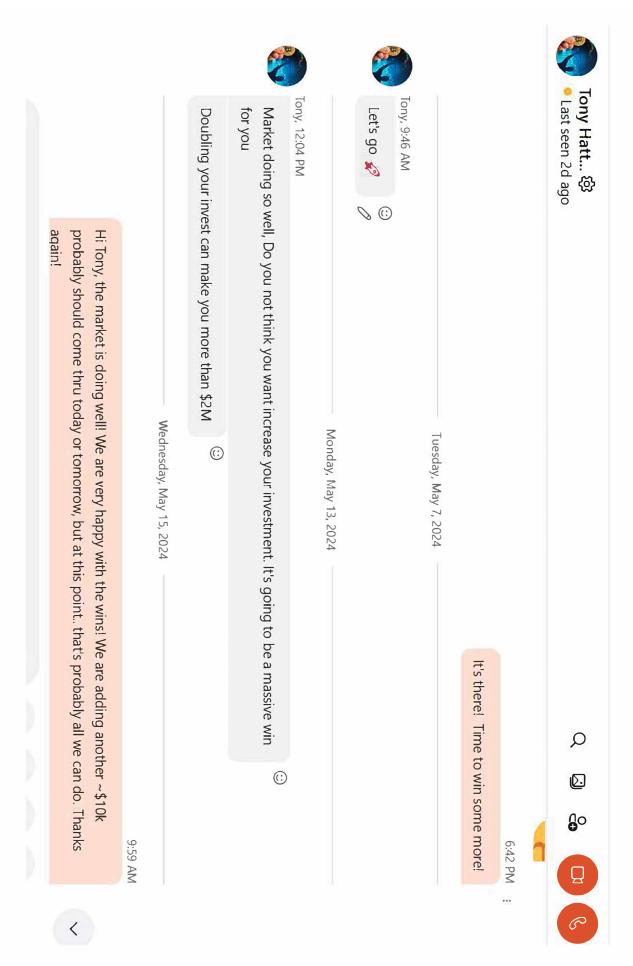


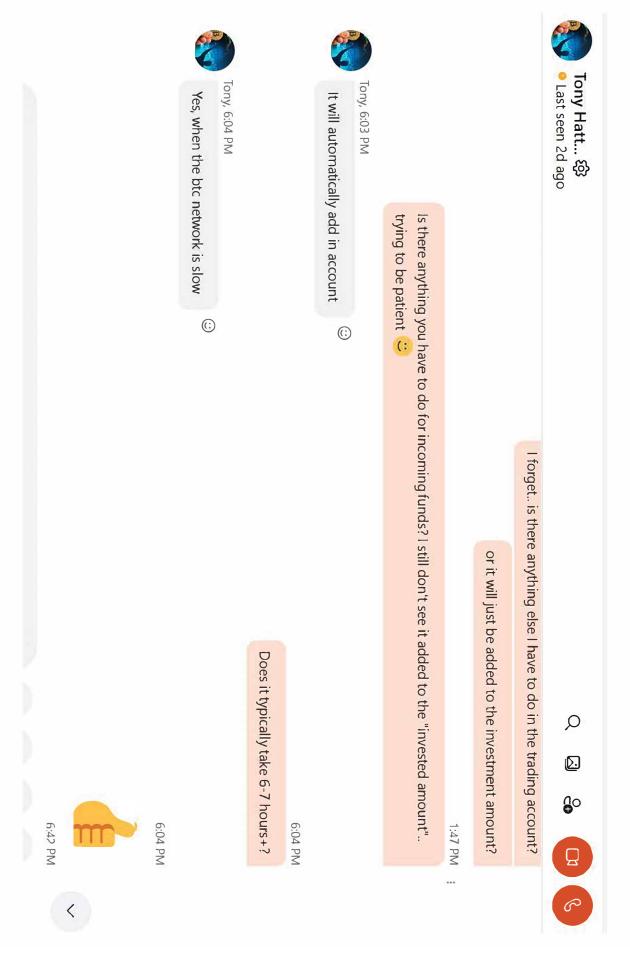


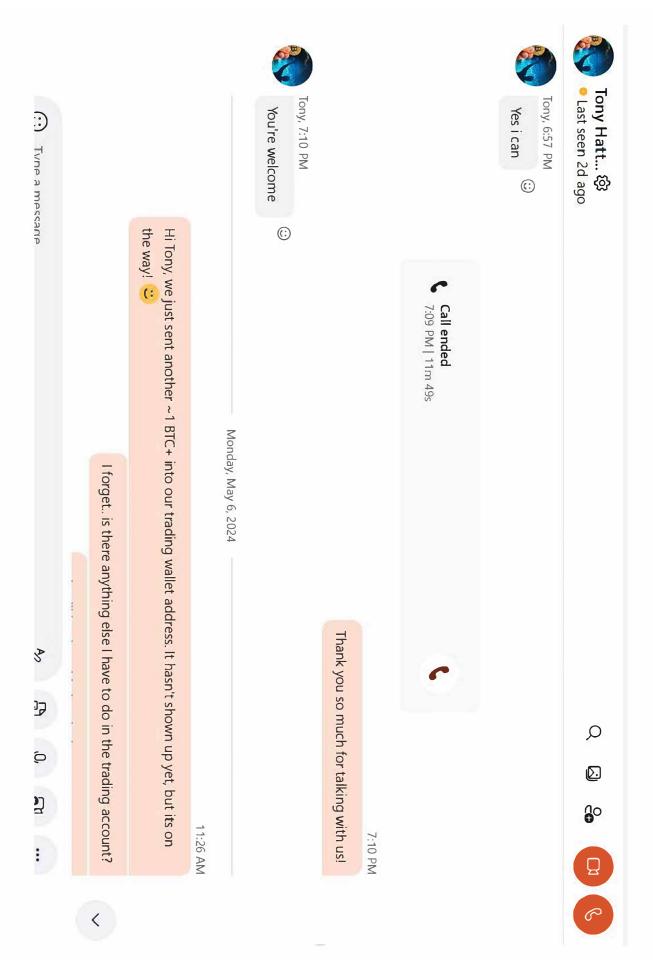


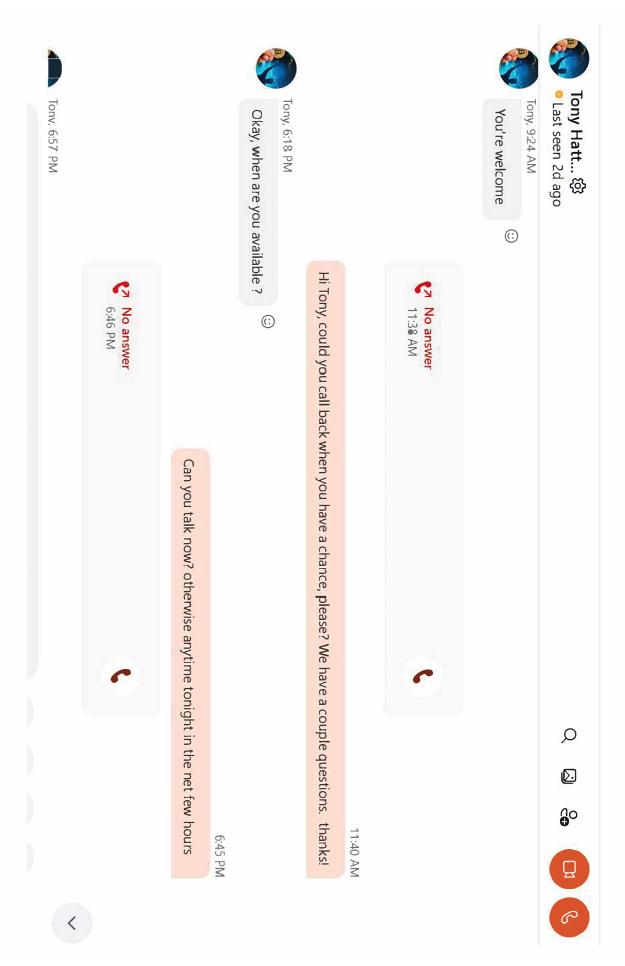


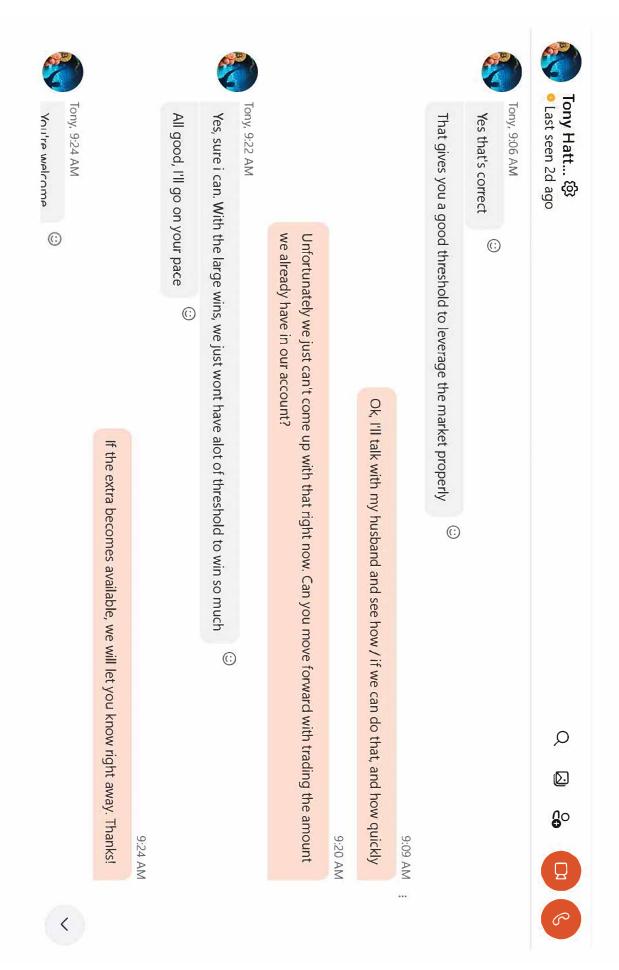


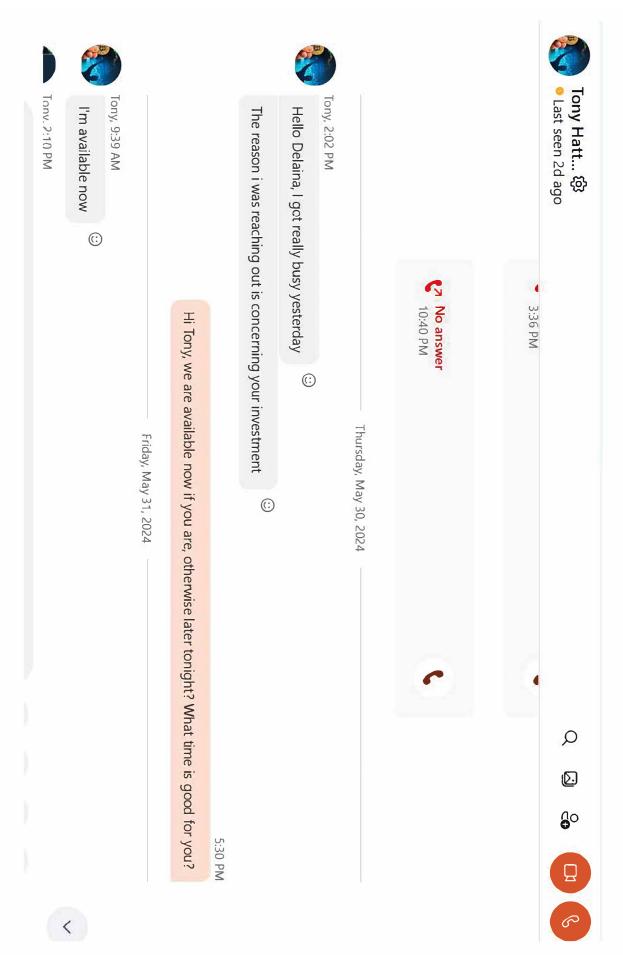


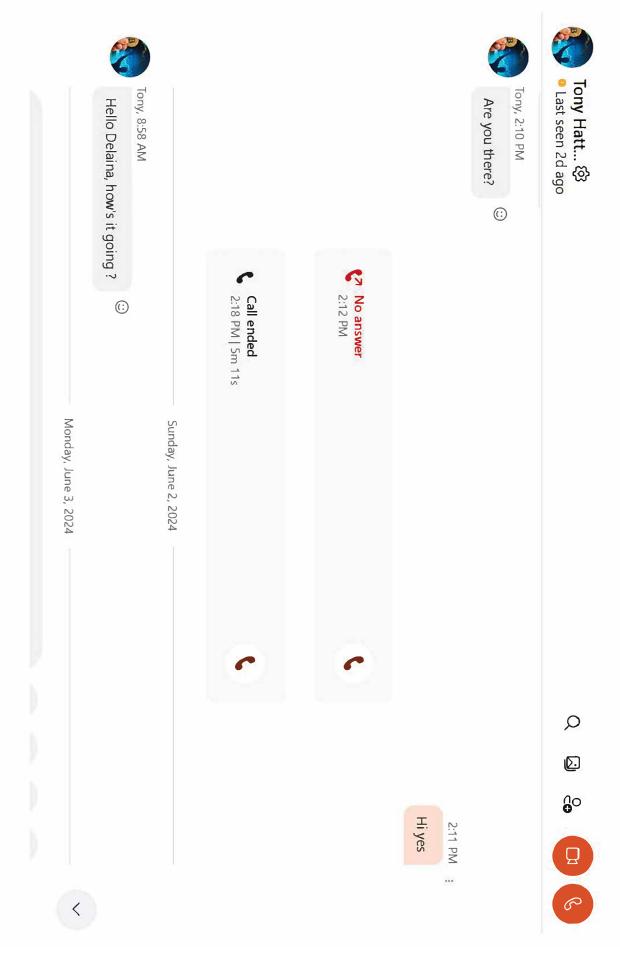


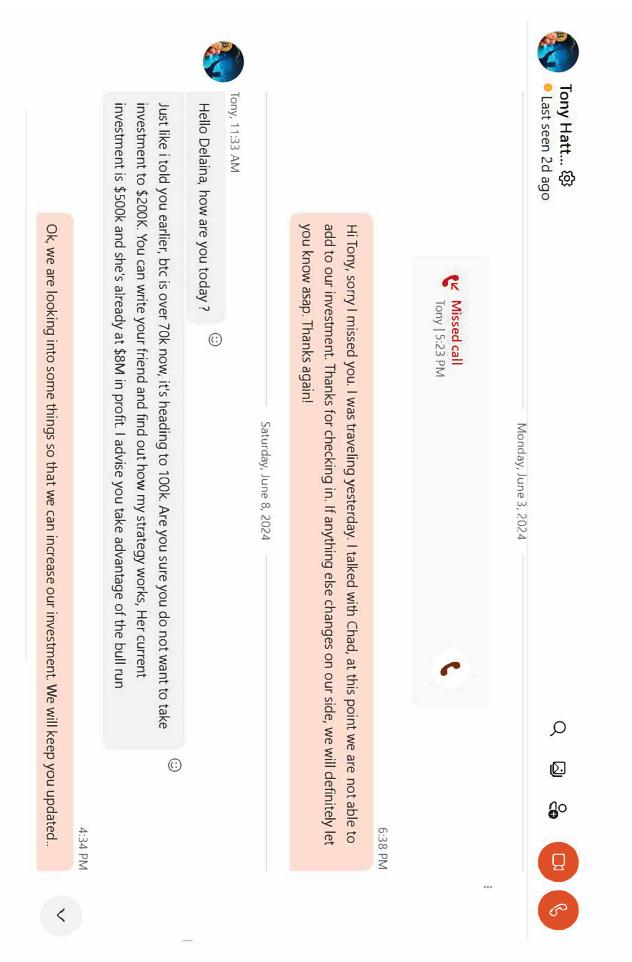




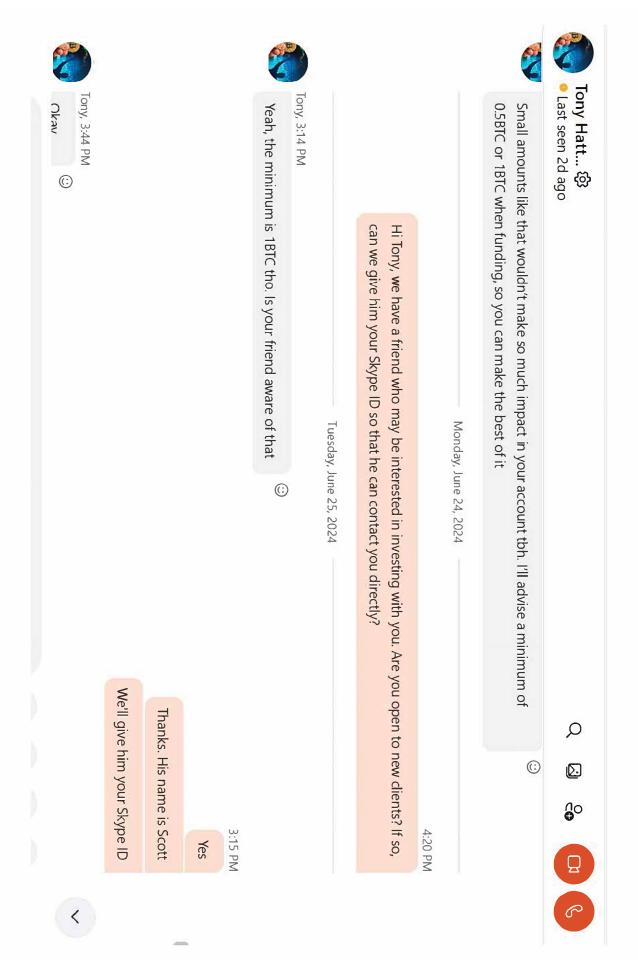


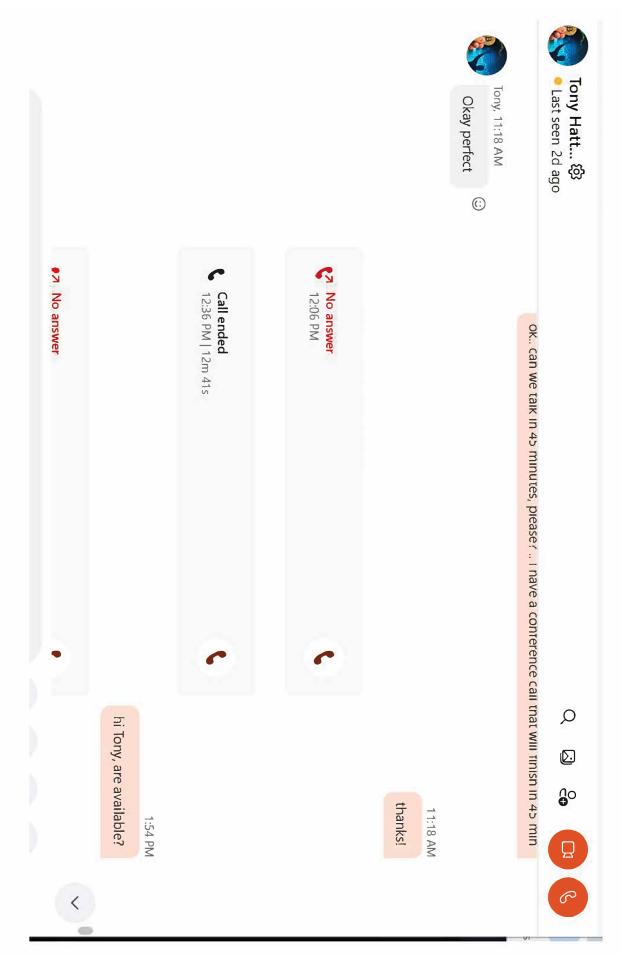


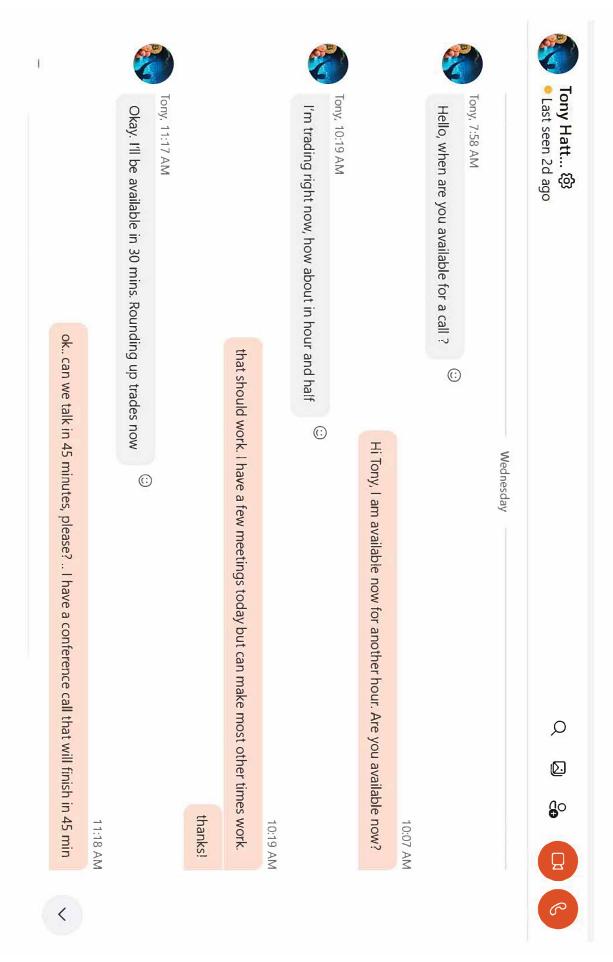


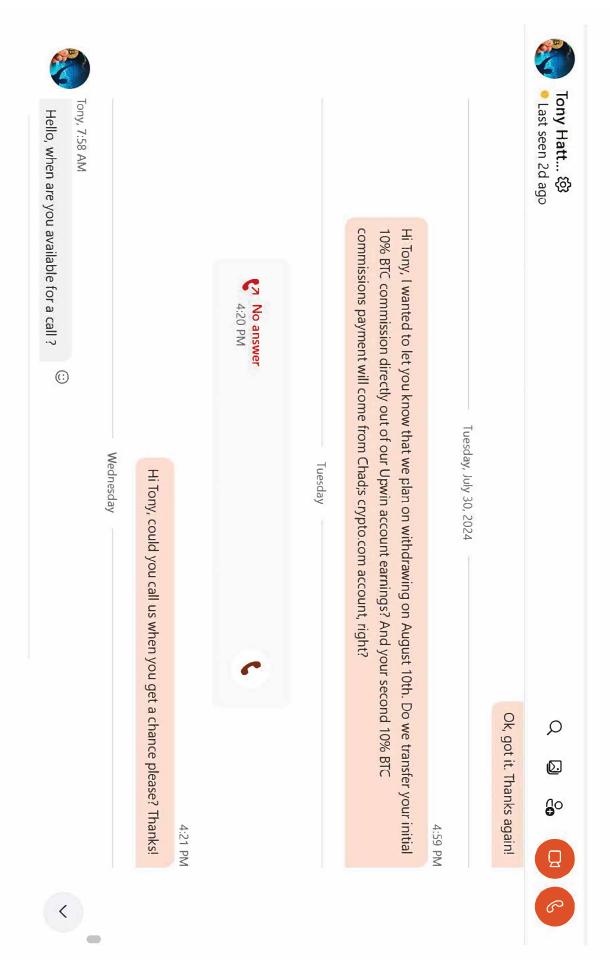


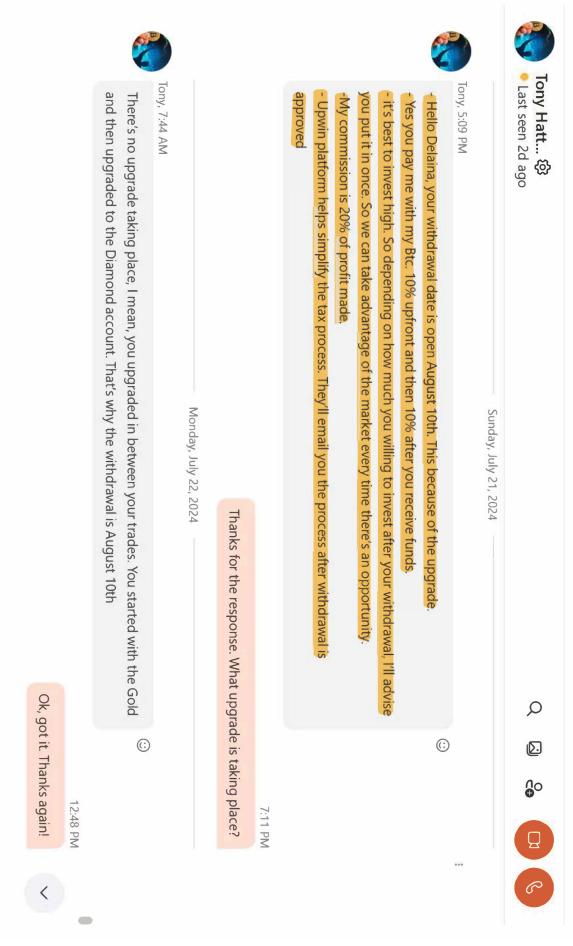
Small amounts like 0.5BTC or 1BTC wh	Tony, 6:55 AM			Tony, 10:25 AM How's it going? Y		Tony, 9:55 PM ©		Tony Hatt 袋 • Last seen 2d ago
Small amounts like that wouldn't make so much impact in your account tbh. I'll advise a minimum of 0.5BTC or 1BTC when funding, so you can make the best of it	Monday, June 17, 2024	Hi Tony, we deposited another small amount today (6/16). We would deposit more if we had it for sure! We will let you know if we come up with more. Thank you!!!	Sunday, June 16, 2024 11:10 PM	How's it going ? You're missing out big time	Wednesday, June 12, 2024		Ok, we are looking into some things so that we can increase our investment. We will keep you updated thanks!	
<								6

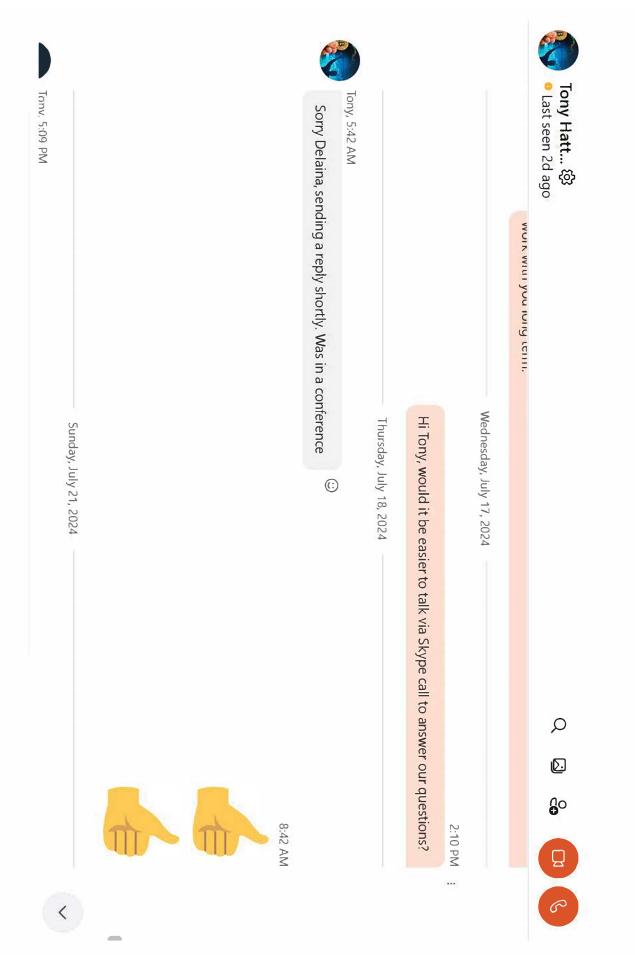


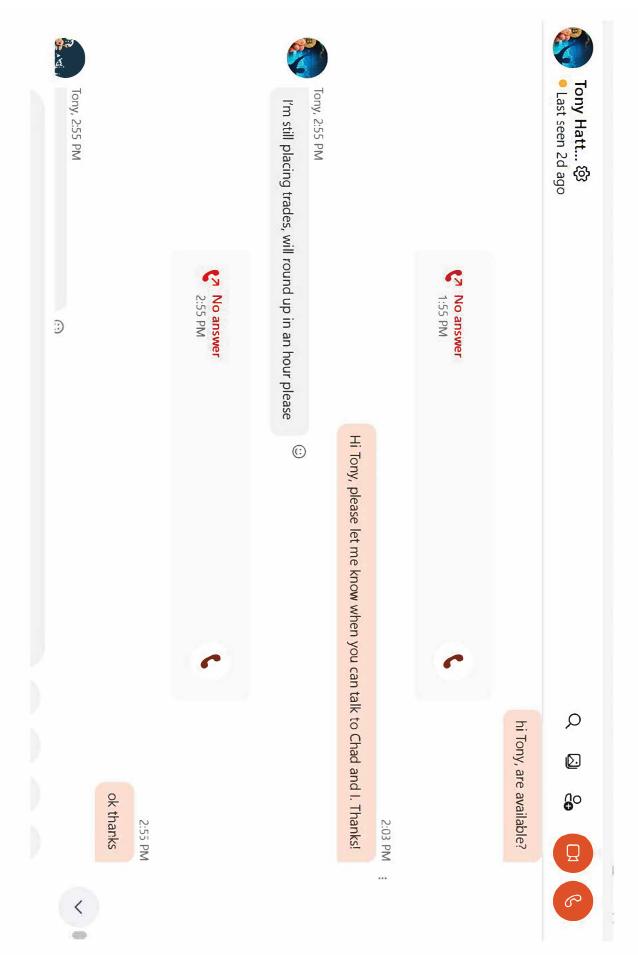


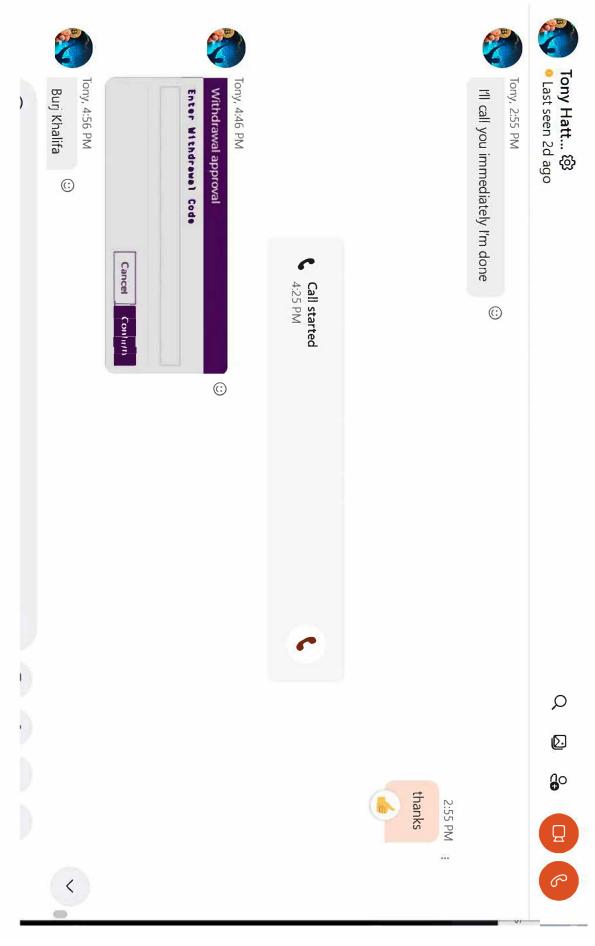


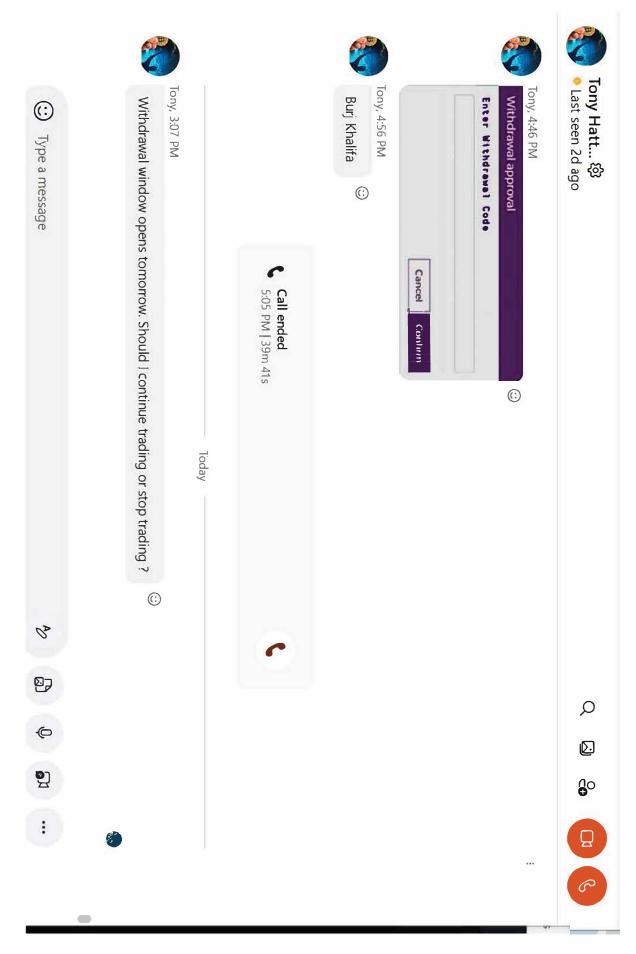












Attachment C

Snyder Crypto.com Transaction History

	4/26/24 15:52 Withdraw BTC (BTC)	5/6/24 15:06 Withdraw BTC (BTC)	5/15/24 18:31 Withdraw BTC (BTC)	6/16/24 23:21 Withdraw BTC (BTC)	Timestamp (UTC) Transaction Description
	втс	втс	втс	втс	Currency
	-1.0423585	-1.0048282	-0.1897242	-0.10159	Amount Native Amount (in USD
:	65672.0893 crypto_withdrawal	62654.48139 crypto_withdrawal	12243.66128 crypto_withdrawal	6718.784257 crypto_withdrawal	t (in USD) Transaction Kind
	3a7994ca5e471ea1a6f390801e318bf48a58dd32b4d95279872ecb58ea29a468	57812e52fbba85d9103dfe99a562098cfefe30e1d7107871b83e660ede784718	b69d2cc4b3124654e246b5d3ac18549c53a19d28fa7c5c542977650ecde44913	de070f941ea31d998b755c9d609071ba6de5a12253d5532fb81a063d9cc99ffb	Transaction Hash

Attachment D

